

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

XR COMMUNICATIONS, LLC, dba
VIVATO TECHNOLOGIES,

Plaintiff,

v.

AT&T SERVICES INC.; AT&T MOBILITY
LLC; and AT&T CORP.,

Defendants,

NOKIA OF AMERICA CORPORATION and
ERICSSON INC.,

Intervenors,

XR COMMUNICATIONS, LLC, dba
VIVATO TECHNOLOGIES,

Plaintiff,

VERIZON COMMUNICATIONS, INC.,
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS,

Defendants,

NOKIA OF AMERICA CORPORATION and
ERICSSON INC.,

Intervenors,

Case No. 2:23-cv-00202-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

Case No. 2:23-cv-00203-JRG-RSP
(Member Case)

XR COMMUNICATIONS, LLC, dba
VIVATO TECHNOLOGIES,
Plaintiff,

v.

T-MOBILE USA, INC.,

Defendants,

NOKIA OF AMERICA CORPORATION and
ERICSSON INC.,

Intervenors,

Case No. 2:23-cv-00204-JRG-RSP
(Member Case)

**DECLARATION OF REZA MIRZAIIE IN SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANT'S/INTERVENOR'S MOTION FOR PARTIAL
SUMMARY JUDGMENT OF NO WRITTEN DESCRIPTION FOR THE '235 PATENT
(DKT. NO. 159)**

I, Reza Mirzaie, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ, August & Kabat, and counsel of record for Plaintiff XR Communications, LLC, in the above-captioned actions. I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently thereto.

2. Attached as **Exhibit A** is a true and correct copy of the U.S. Provisional Appl. No. 70/423,660.

3. Attached as **Exhibit B** is a true and correct copy of excerpts from Defendants' P.R. 3-3 and 3-4 Disclosures, dated October 12, 2023.

Executed on June 18, 2025 at Marshall, Texas.

/s/ Reza Mirzaie
Reza Mirzaie